IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO et al.,

Debtors.¹

Case No. 17 BK 3283-LTS

(Jointly Administered)

PROMESA Title III

INFORMATIVE MOTION OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. REGARDING THE JULY 24-25, 2019 OMNIBUS HEARING

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, "<u>Assured</u>") hereby submit this informative motion in compliance with the *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019 Omnibus Hearing* (ECF No. 7963)², and respectfully state as follows:

William J. Natbony, Thomas J. Curtin, and Casey J. Servais of Cadwalader,
 Wickersham & Taft LLP will appear on behalf of Assured at the July 24-25, 2019 Omnibus

The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² "<u>ECF No.</u>" refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

Hearing in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

2. Mr. Natbony, Mr. Curtin, and Mr. Servais will present oral argument, on behalf of Assured on the following: (i) in support of Motion of Ambac Assurance Corporation Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds (ECF No. 7212), (ii) in opposition to Renewed Motion of the Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Section 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority, Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds (ECF No. 7814), (iii) in opposition to Motion to Stay Contested Matters Pending Confirmation of Commonwealth Plan of Adjustment (ECF No. 7640), (iv) in support of Amended Motion of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, to (A) Extend Deadlines and (B) Establish Revised Procedures With Respect to Omnibus Objections to Claims of Holders of Certain Commonwealth General Obligation Bonds Issued in 2011, 2012 and 2014, and for Related Relief (ECF No. 7154), (v) in opposition to Plaintiff Financial Oversight and Management Board for Puerto Rico's Motion to Stay PBA Adversary Proceeding Pending Confirmation of Commonwealth Plan of Adjustment (ECF No. 99)³, and (vi) on all other related papers.

³ "ECF No. 99" refers to a document filed in Case No. 18-00149-LTS.

3. Mr. Natbony, Mr. Curtin, and Mr. Servais reserve the right to be heard on any matter raised by any party at the hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of Assured.

Dated: July 18, 2019

New York, New York

CASELLAS ALCOVER & BURGOS P.S.C.

/s/ Heriberto Burgos Pérez

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, 18th day of July, 2019.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.*

* admitted pro hac vice